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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

KELLY CAHILL, et al., individually and
on behalf of others similarly situated,
Plaintiffs,

vs.

NIKE, INC., an Oregon Corporation,
Defendant.

Case No. 3:18-cv-01477-JR

**PLAINTIFFS' UNOPPOSED MOTION
TO UNSEAL ECF NOS. 211, 212, 215
AND FILE A REDACTED COPY OF
ECF NO. 214**

**PLS.' UNOPPOSED MOTION TO UNSEAL ECF NOS. 211, 212, 215 AND FILE A REDACTED COPY
OF ECF No. 214**

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L.R. 7-1(a) Certification

In compliance with Local Rule 7-1(a), Plaintiffs certify that they have conferred on this Motion with Defendant Nike, Inc.'s counsel regarding the substance of this Motion. Nike does not oppose this Motion.

MOTION TO UNSEAL

Plaintiffs hereby submit this Motion to Unseal. On April 15, 2022, Plaintiffs filed their Opposition to Nike's Motion to Exclude Opinions of Dr. Lundquist ("Lundquist Opp.") and supporting Goldstein declaration under seal pursuant to the Parties' Protective Order because documents and information included in the Motion and declaration exhibits were stamped Confidential by Nike under the Protective Order. *See* ECF Nos. 211, 212. On April 15, 2022, Plaintiffs filed their Opposition to Nike's Motion to Exclude Opinions of Dr. Neumark ("Neumark Opp.") and supporting Kan declaration under seal pursuant to the Parties' Protective Order because documents and information included in the Motion and declaration exhibits were stamped Confidential by Nike under the Protective Order. *See* ECF Nos. 214, 215.

Plaintiffs met and conferred with Nike on unsealing the motions and supporting declarations, and Nike stated it has no objection to unsealing the Lundquist Opp. and supporting Goldstein declaration and the Kan declaration supporting the Neumark Opp. Declaration of Mengfei Sun ("Sun Decl.") ¶ 2, filed herewith. As such, Plaintiffs respectfully request that the Court unseal the Lundquist Opp., Goldstein declaration, and Kan declaration, ECF Nos. 211, 212, 215.

Nike opposes unsealing the Neumark Opp., ECF No. 214, with respect to several proposed redactions. Sun Decl. ¶ 3. Plaintiffs disagree with Nike's proposed redactions for the Neumark Opp., which involve aggregated statistical analysis results. However, this issue is already before the Court in Nike's Motion to Seal, ECF No. 171, and Plaintiffs' Opposition to

Nike's Motion to Seal, ECF No. 175. In the interest of judicial efficiency, Plaintiffs have agreed that the Neumark Opp. may remain sealed as to Nike's proposed redactions and that Nike can have until 7 days after the Court rules on its Motion to Seal before submitting a motion to seal for its proposed redactions in the Neumark Opp. Sun Decl. ¶ 3. In the interim, to allow the public to have access to the parts of the Neumark Opp. that Nike does not seek to seal, Plaintiffs file a redacted copy of the Neumark Opp. with Nike's proposed redactions (contested by Plaintiffs), attached as Exhibit 1 to the Sun Decl.

Dated: April 27, 2022

Respectfully submitted,

GOLDSTEIN, BORGEN, DARDARIAN & HO

/s/ James Kan

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